NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP LEED ENVIRONMENTAL, INC.

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May 2, 2003

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First Class Mail

Mr. Brad Bradley U.S. Environmental Protection Agency 77 West Jackson Boulevard Chicago, IL 60604-3590

> RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois Consent Decree Progress Report 48 (April 2003)

Dear Mr. Bradley:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the "site"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") to provide the U.S. Environmental Protection Agency ("EPA") with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, the remedial action for groundwater, and operation and maintenance activities that were performed during April 2003.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- On April 4, 2003, the Group's project coordinator issued a progress report to EPA.
- On or about April 16, 2003, the Group's project coordinator and ENTACT received EPA's April 10, 2003 letter which approved with one modification the Five-Year Review Project Work Plan for inspecting the main industrial site and conducting soil sampling activities at the site.
- On April 18, 2003, the Group's project coordinator provided a letter to advise EPA that ENTACT plans to mobilize to Granite City during the week of May 5, 2003 to collect soil samples in accordance with the Five-Year Review Project Work Plan.

EPA Region 5 Records Ctr. 260525

- On April 23, 2003, the Group's project coordinator provided to EPA a revised Table 1 and revised Figure 1, prepared by ENTACT, to respond to EPA's April 10, 2003 letter which approved the Five-Year Review Project Work Plan.
- On April 23, 2003, the Group's project coordinator issued a letter to EPA to provide an inspection log and reproductions of photographs from ENTACT's March 28, 2003 operation and maintenance inspection at the site.
- On April 25, 2003, the Group's project coordinator issued a letter to EPA requesting that EPA provide a written certification to the Group pursuant to Section 48(b) of the Consent Decree to confirm that the Group has completed remedial action at the site.
- On April 28, 2003, Dennis Reis, Esq. issued a letter to EPA on behalf of the Group in regard to the Supplemental Environmental Project ("SEP"). The letter indicated that the Group has been working with the Madison County Community Development Agency ("MCCDA") as required by the Consent Decree, requested EPA's approval for the MCCDA to submit the draft SEP work plan to EPA by July 19, 2003, and requested clarifications from EPA to other questions related to the SEP.
- On April 29, 2003, the Group's project coordinator issued a letter to EPA regarding the financial security provisions of the Consent Decree. Specifically, the letter requested EPA's approval to reduce the amount of financial security for the site, and requested written confirmation that the Johnson Controls' 2002 Annual Report is sufficient to demonstrate the Group's financial ability to complete the remaining work at the site.
- On April 29, 2003, the Group's project coordinator issued a letter to EPA seeking EPA's written confirmation that it is not necessary for the Group to maintain comprehensive general liability insurance and automobile liability insurance pursuant to the Consent Decree because remedial activities have been completed at the site.
- During April 2003, STL Savannah continued to analyze groundwater samples collected at the site by ARCADIS personnel during the week of March 24, 2003.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.
- 3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:
 - Not applicable for this reporting period.
- 4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:
 - As noted above, the Group's project coordinator issued a copy of ENTACT's March 28, 2003 operation and maintenance inspection report to EPA on April 23, 2003. The Group will advise EPA regarding its plans for performing maintenance activities at the site to address the items in ENTACT's report.
 - STL Savannah will continue to analyze groundwater samples collected at the site by ARCADIS during the week of March 24, 2003. Upon completion of laboratory testing and receipt of laboratory data, ARCADIS will initiate efforts to validate the data and prepare a report to summarize the data.
 - As noted above, ENTACT will initiate soil sampling activities at the site during the week of May 5, 2003 in accordance with the Five-Year Review Project Work Plan.
- 5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:
 - Not applicable for this reporting period.
- 6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:
 - Not applicable for this reporting period.
- 7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:
 - Not applicable for this reporting period.

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Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.

Jehrey A. Deed Project Coordinator

cc: Ms. Sandra Bron - Illinois EPA (by first class mail)
Mr. Jack Kratzmeyer - ARCADIS (by first class mail)
Mr. Rich Wood - ENTACT, Inc. (by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group (by first class mail)